

EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA**

RYSTA LEONA SUSMAN, both
individually and as Legal Guardian of
SHANE ALLEN LOVELAND, et al.,

Plaintiffs,

V.

Case No. 8:18-cv-00127

THE GOODYEAR TIRE & RUBBER
COMPANY,

Defendant.

**DECLARATION OF CLARK W. HEDGER IN SUPPORT OF
THE GOODYEAR TIRE & RUBBER COMPANY'S
MOTION FOR LEAVE TO AMEND ANSWER
TO INCLUDE OHIO STATUTORY DEFENSE TO PUNITIVE DAMAGES CLAIM**

I, Clark W. Hedger, declare as follows:

1. My name is Clark W. Hedger. I understand the nature of this oath, and I am competent to testify to the matters stated in this Declaration. This testimony is based on my own personal knowledge, and the facts stated herein are true and correct.

2. True and accurate copies of the documents identified in The Goodyear Tire & Rubber Company's Motion for Leave to Amend Answer to Include Ohio Statutory Defense to Punitive Damages Claim are attached to the Index in Support of The Goodyear Tire & Rubber Company's Brief in Support of Its Motion for Leave to Amend Answer to Include Ohio Statutory Defense to Punitive Damages Claim.

Pursuant to 28 U.S.C. Section 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 11th day of March, 2020, in St. Louis, Missouri.

CLARK W. HEDGER